UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

CR16-196 ADM/LIB

INDICTMENT

UNITED STATES OF AMERICA,

18 U.S.C. § 1470

Plaintiff,

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

18 U.S.C. § 2253(a)

MICHAEL ROBERT GRANLEY,

V.

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Transfer of Obscene Material to Minor)

On or about August 27, 2015, in the State and District of Minnesota, the defendant,

MICHAEL ROBERT GRANLEY,

did, by means of interstate and foreign commerce, specifically the Internet, knowingly transfer and attempt to transfer obscene matters, specifically images of an erect penis, to another individual, Minor #1, who had not attained the age of 16 years, knowing that Minor #1 had not attained the age of 16 years, all in violation of Title 18, United States Code, Section 1470.

COUNT 2

(Transfer of Obscene Material to Minor)

On or about August 31, 2015, in the State and District of Minnesota, the

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defendant,

MICHAEL ROBERT GRANLEY,

did, by means of interstate and foreign commerce, specifically the Internet, knowingly transfer and attempt to transfer obscene matters, specifically images of an erect penis and a nude image of **MICHAEL ROBERT GRANLEY**, to another individual, Minor #1, who had not attained the age of 16 years, knowing that Minor #1 had not attained the age of 16 years, all in violation of Title 18, United States Code, Section 1470.

COUNT 3

(Production of Child Pornography)

On or about August 31, 2015, in the State and District of Minnesota, the defendant,

MICHAEL ROBERT GRANLEY,

did employ, use, persuade, and entice a minor, MINOR #1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, including, but not limited to the following computer image files:

- (1) File name: 11940301_1619415824978162_223391759_n.jpg, an image showing MINOR #1's vagina; and
- (2) File name: 11938065_1619416461644765_568264480_n.jpg, an image

showing MINOR #1's vagina;

knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of, and in and affecting interstate and foreign commerce, and which visual depictions were transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 4

(Transfer of Obscene Material to Minor)

On or about October 25, 2015, in the State and District of Minnesota, the defendant,

MICHAEL ROBERT GRANLEY,

did, by means of interstate and foreign commerce, specifically the Internet, knowingly transfer and attempt to transfer obscene matters, specifically an image of an erect penis, to another individual, Minor #1, who had not attained the age of 16 years, knowing that Minor #1 had not attained the age of 16 years, all in violation of Title 18, United States Code, Section 1470.

COUNT 5

(Production of Child Pornography)

On or about October 25, 2015, in the State and District of Minnesota, the defendant,

MICHAEL ROBERT GRANLEY,

did employ, use, persuade, and entice a minor, MINOR #1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, including, but not limited to the following computer image file:

(1) File name: 12179682_130349153988956_1894735128_n.jpg, an image showing MINOR #1's vagina;

knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of, and in and affecting interstate and foreign commerce, and which visual depiction was transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 6

(Transfer of Obscene Material to Minor)

On or about November 7, 2015, in the State and District of Minnesota, the

defendant,

MICHAEL ROBERT GRANLEY,

did, by means of interstate and foreign commerce, specifically the Internet, knowingly transfer and attempt to transfer obscene matters, specifically an image of an erect penis, to another individual, Minor #1, who had not attained the age of 16 years, knowing that Minor #1 had not attained the age of 16 years, all in violation of Title 18, United States Code, Section 1470.

COUNT 7

(Production of Child Pornography)

On or about November 8, 2015, in the State and District of Minnesota, the defendant,

MICHAEL ROBERT GRANLEY,

did employ, use, persuade, and entice a minor, MINOR #2, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, including, but not limited to the following computer image files:

- (1) File name: 12212253_428402157355202_82854091_n.jpg, a nude image of MINOR #2 laying on a bed showing her neck area to her feet, including her pubic area; and
- (2) File name:

bxu67ah3l0gg884012231627_428402827355135_1662776733_n.jpg, an image showing MINOR #2's vagina;

knowing and having reason to know that such visual depictions would be transported and transmitted using a means and facility of, and in and affecting interstate and foreign commerce, and which visual depictions were transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 8

(Transfer of Obscene Material to Minor)

On or about December 23, 2015, in the State and District of Minnesota, the defendant,

MICHAEL ROBERT GRANLEY,

did, by means of interstate and foreign commerce, specifically the Internet, knowingly transfer and attempt to transfer obscene matters, specifically an image of an erect penis, to another individual, Minor #3, who had not attained the age of 16 years, knowing that Minor #3 had not attained the age of 16 years, all in violation of Title 18, United States Code, Section 1470.

COUNT 9

(Transfer of Obscene Material to Minor)

On or about December 28, 2015, in the State and District of Minnesota, the defendant,

MICHAEL ROBERT GRANLEY,

did, by means of interstate and foreign commerce, specifically the Internet, knowingly transfer and attempt to transfer obscene matters, specifically an image of an erect penis, to another individual, Minor #3, who had not attained the age of 16 years, knowing that Minor #3 had not attained the age of 16 years, all in violation of Title 18, United States Code, Section 1470.

COUNT 10

(Transfer of Obscene Material to Minor)

On or about December 29, 2015, in the State and District of Minnesota, the defendant,

MICHAEL ROBERT GRANLEY,

did, by means of interstate and foreign commerce, specifically the Internet, knowingly transfer and attempt to transfer obscene matters, specifically an image of an erect penis, to another individual, Minor #1, who had not attained the age of 16

years, knowing that Minor #1 had not attained the age of 16 years, all in violation of Title 18, United States Code, Section 1470.

COUNT 11

(Attempted Production of Child Pornography)

On or about December 29, 2015, in the State and District of Minnesota, the defendant,

MICHAEL ROBERT GRANLEY,

did attempt to employ, use, persuade, and entice a minor, MINOR #1, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using a means and facility of, and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 12

(Transfer of Obscene Material to Minor)

On or about December 29, 2015, in the State and District of Minnesota, the defendant,

MICHAEL ROBERT GRANLEY,

did, by means of interstate and foreign commerce, specifically the Internet,

knowingly transfer and attempt to transfer obscene matters, specifically an image of an erect penis, to another individual, Minor #3, who had not attained the age of 16 years, knowing that Minor #3 had not attained the age of 16 years, all in violation of Title 18, United States Code, Section 1470.

COUNT 13

(Transfer of Obscene Material to Minor)

On or about January 11, 2016, in the State and District of Minnesota, the defendant,

MICHAEL ROBERT GRANLEY,

did, by means of interstate and foreign commerce, specifically the Internet, knowingly transfer and attempt to transfer obscene matters, specifically an image of an erect penis, to another individual, Minor #3, who had not attained the age of 16 years, knowing that Minor #3 had not attained the age of 16 years, all in violation of Title 18, United States Code, Section 1470.

COUNT 14

(Attempted Production of Child Pornography)

On or about January 12, 2016, in the State and District of Minnesota, the defendant,

MICHAEL ROBERT GRANLEY,

did attempt to employ, use, persuade, and entice a minor, MINOR #3, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using a means and facility of, and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 15

(Transfer of Obscene Material to Minor)

On or about January 13, 2016, in the State and District of Minnesota, the defendant,

MICHAEL ROBERT GRANLEY,

did, by means of interstate and foreign commerce, specifically the Internet, knowingly transfer and attempt to transfer obscene matters, specifically an image of an erect penis, to another individual, Minor #3, who had not attained the age of 16 years, knowing that Minor #3 had not attained the age of 16 years, all in violation of Title 18, United States Code, Section 1470.

FORFEITURE ALLEGATIONS

Counts 1 through 15 of this Indictment are hereby re-alleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

Upon conviction to any of counts 3, 5, 7, 11 or 14, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

- (1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including:
- a. a Verizon Tablet, model QMV7B Ellipsis 7, serial number OR4TSS9TAEVCS48D; and

b. An Apple IPhone 6, serial number F78PL4TXG5MG.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2252(a)(2), 2252(a)(4)(B), and 2253(a).

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UNITED STATES ATTORNEY	FOREPERSON	